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October 10, 2024

Via ECF

Hon. Julien X. Neals, U.S.D.J.
Martin Luther King, Jr. Federal Building
and U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *In re Apple Inc. Smartphone Antitrust Litigation*
Civil Action No. 2:24-md-03113 (JXN)(LDW)

Dear Judge Neals:

We represent plaintiff Joseph Giamanco and the proposed class of Apple Watch purchasers in this multi-district litigation, along with attorneys from Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C., Korein Tillery LLC, and MoloLamken LLP. We write in response to your Text Orders of October 9 and October 10 directing plaintiffs to outline the organizational issues they propose to address at the hearing scheduled for November 6, 2024, and to identify the counsel that will attend that hearing. MDL Dkt. Nos. 28, 29.

We support the request of the iPhone purchaser plaintiffs to use the November 6 hearing to discuss the pending motions to appoint interim lead counsel under Rule 23(g). Although Mr. Giamanco's motion to appoint his counsel interim lead counsel for the Apple Watch purchasers is unopposed, we would be present to answer any questions Your Honor has about Mr. Giamanco's motion or plans for coordination of the iPhone and Apple Watch cases.

I currently plan to attend the hearing on November 6 along with the following co-counsel for Mr. Giamanco and the proposed Apple Watch purchaser class: George Zelcs from Korein Tillery LLC, Ariela Migdal and Alex Parkinson from Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C., and Kayvon Ghayoumi from MoloLamken LLP.

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Respectfully Submitted,

/s/ Thomas R. Curtin

Thomas R. Curtin

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cc: All counsel (w/enc.) (by ECF)